

USDC SDNY DOCUMENT **ELECTRONICALLY FILED** DOC #: 11/4/2021 DATE FILED:

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Labor and Employment Law Division

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## THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007

November 3, 2021

## **BY ECF**

Honorable Victor Marrero United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: Samaan v. The City of New York et al.

Civil Action No. 18 Civ. 9221 (VM)(DCF)

Law Dept. No.: 2018-069995

Dear Judge Marrero:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for Defendants City of New York, Robert D'Allessio, Geoffrey Eisele, Matthew Millner, and Leonid Miller (collectively "Defendants") in the above-referenced action. Defendants submit this letter in accordance with this Court's Rule 1(F) to request an extension of time for Defendants to submit a pre-motion letter prior to moving for summary judgment from November 5, 2021 to November 12, 2021. This is Defendants' second request for an extension of time and Plaintiff has consented to this request.

This brief adjournment is necessary as Defendants have just received deposition transcripts from Plaintiff as of this afternoon. Defendants require additional time in order to review these transcripts and incorporate them into their pre-motion letter. This will allow Defendants to properly place before the Court the issues to be addressed in Defendants' anticipated motion. Accordingly, Defendants respectfully request a one week extension of time to submit a pre-motion letter.

Thank you for your consideration of this request.

Respectfully Submitted,

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Nicholas Green Assistant Corporation Counsel

Victor Marrero U.S.D.J.

## cc: By ECF

Anthony C. Ofodile, Esq. *Attorney for Plaintiff* 498 Atlantic Avenue Brooklyn, New York 11217

The deadline for Defendants to file a pre-motion letter prior to moving for summary judgment, in accordance with the Court's Individual Rules, is extended to November 12, 2021.

Additionally, the case management conference currently scheduled for November 5, 2021, is hereby rescheduled to January 28, 2022, at 12:00 p.m.

SO ORDERED.

November 4, 2021